

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

United States of America,)	Criminal. No.: 2:24-cr-234
)	
vs.)	
)	
Angel Vause,)	
)	
Defendant.)	
_____)	

SENTENCING MEMORANDUM

INTRODUCTION

Angel Vause respectfully requests that a guideline sentence be applied in this case. A sentence of 70 to 87 months is more than adequate to punish a 57-year-old woman who is a criminal history category I.

The government's request for an upward variance is outrageous and unsupported by the facts agreed upon by both parties at the change of plea hearing. In requesting a variance of 201 months, the government chooses to rely on the statements of an admitted murderer and serial rapist, a statement provided after the change of plea hearing, which contradicts the government's own investigation and recitation of facts. Because the government's reliance on obviously untrue statements is the basis for their motion, it should be denied.

When Angel Vause entered her guilty plea, she agreed to, and relied upon, the contents of the indictment and the government's factual recitation. She did so in good faith after lengthy consultations with her attorney and his staff. The government provided her with specific allegations which supported their case that she lied to the FBI with three material

misrepresentations.

When she entered her guilty plea, Ms. Vause did not know that the government would engage in further talks with a known liar, rapist, and murderer, and use his claims to sandbag her with additional accusations to bolster its request for an enhanced sentence. In interviewing Ray Moody, the government leveraged Moody's desire to manipulate the acquisition of his land by the victim's family, his concern for jail credibility, and his anger at Angel Vause. As a result, the accusations against her are far more serious, twisted, and disturbing than what she agreed to her at her guilty plea. More importantly, Moody's claims are complete lies.

THE PROSECUTION OF ANGEL VAUSE

On March 26, 2024, the government indicted Ms. Vause for three counts of providing false statements to the FBI. ECF No. 2. At her initial appearance, the government did not move for detention and Ms. Vause was released on bond. ECF No. 15. She remained on bond without incident and was taken into custody after her guilty plea on September 9, 2024.

The government's initial plea offer was for Ms. Vause to plead guilty to two counts, specifically counts 1 and 3. ECF 34. At the time, the government and the defendant believed the statutory maximum to be five years for each count. *Id.* Therefore, under the terms of the first guilty plea, Ms. Vause faced a maximum term of ten years. On August 12, 2024, the day of her first scheduled guilty plea, it was discovered that the maximum would be 8 years per count. ECF No. 37. The original change of plea hearing was continued for Ms. Vause to consider the possible enhanced penalty. *Id.*

Two weeks later, on August 27, 2024, Ms. Vause was again scheduled to change her plea to guilty. The deal was the same, a plea to counts 1 and 3, only this time the plea agreement reflected the statutory maximum of eight years per count. She would now be facing a maximum

possible sentence of sixteen years.

She was ready to plead guilty. She had met extensively for hours with her attorney, his investigator, and other attorneys in the federal public defender's office. She reviewed the discovery. In particular, she was shown the carefully constructed version of events which the assistant united states attorney and FBI agents had presented to her.

But there was a problem, Ray Moody. He sat in his prison cell. He was angry. What little shreds of power and influence that he still fancied himself to have would to be taken away. If she took the plea, Angel would no longer be in his power. She was going to enter into an agreement with the government and he did not approve.

He got on the phone with his lawyers. He somehow convinced one of them to personally contact Angel on the morning of her guilty plea. This attorney told Angel that Ray did not want her to plead guilty, that Angel's guilty plea was somehow in violation of Ray's prior agreement with the FBI and Horry County prosecutors. Even from a prison cell, Ray still held sway over Angel. When she appeared before the Court, she broke down in tears and did not proceed with her guilty plea. Her case was set for trial.

With her plea agreement revoked, Angel now faced 24 years in prison. She continued to meet with her attorneys and review the case against her. She was informed that Ray's agreements with the government and the statements of his lawyers had no impact on the case against her. She had been manipulated by Ray.

Once she came to terms with this, she again decided to plead guilty. On September 9, 2024, she pled guilty to all three counts and was taken into custody. During her guilty plea, Angel agreed to the government's recitation of facts. She agreed that she lied when she said she travelled north after leaving Ray and the victim. She had in fact driven south. She admitted that

the victim's phone was with her in the truck when she travelled south, and she admitted that the victim did not consume any drugs or agree to consume any with Angel and Moody. At no point did the government accuse Angel of being present at the time of the victim's rape and murder. At no point did the government accuse Angel of plotting with Moody to kidnap a girl. At no point did the government accuse Angel of actively luring the victim into Moody's truck.

Angel agreed that she lied to the FBI in three ways, specified in the indictment, the factual recitation and the discovery provided, which she relied upon in making her decision to enter knowingly into a guilty plea. She decided to admit her wrongdoing and take responsibility despite Ray's attempts to control her and persuade her to do otherwise.

Ray was furious. He had wanted Angel to go to trial. He had lost control of her. There was only one way for him to lash out. Again, he called his lawyers and set up a meeting with the government.

NEW STATEMENTS

After indicting Ms. Vause, the government painstakingly reviewed cellphone records, surveillance cameras, and license plate readers. Their evidence was extremely specific because it pinpointed where there must have been falsehoods in Angel's statements to the FBI. As to counts 1 and 2, the falsehoods related to details Angel gave the FBI about her whereabouts. She said that she drove north after dropping off Ray with his victim. The government contended that she drove south and used cellphone tower records and license plate readers to determine this fact.

The government now adopts the incredible and clearly false claims of Ray Moody, specifically a claim that he left Ms. Vause and the victim alone at the Pole Yard, giving Ms. Vause an opportunity to let the victim escape, so that he could drive all the way back to his apartment to take a shower and retrieve a brief case of "sex toys." The government fails to

explain how this is consistent with their own evidence of a license plate reader which did not record the Ford Explorer driving north that night. This is because Ray Moody is lying.

His story is inconsistent in other ways. According to Moody, he planned to go to Myrtle Beach to abduct a girl. He planned it carefully and brought along a “kit” including handcuffs, an ice pick and nylon rope. Why did he have to drive to get the sex toys? He didn’t, he’s lying. Then he makes the claim that he returned with the sex toys and that the victim said, “no” when he took them out of the case. He claims he complied with this request. The government apparently believes that Ray Moody was simultaneously honoring requests from his victim while holding her against her will and preparing to rape and murder her.

Ray’s story does agree with the government’s evidence in one important way, however. Ray knew that he could not claim that Angel was with him the entire time he committed his crimes. Cell phone data demonstrated that he was calling Angel while he was at the Pole Yard with the victim. He was calling Angel because they were not together. But he wants this Court to believe that Angel was with him during his crimes. He deals with this by claiming that he was left alone with the victim for an hour and a half and that no crimes were committed against the victim, other than holding her against her will.

Ray Moody suddenly, magically, transformed into a person with self-restraint, for 90 minutes, until Angel returned. There is also a glaring absence of any details of what exactly he and the victim did for an hour and a half while they waited for Angel to return. He apparently wasn’t creative enough to fill in this gap with more lies. What happened during that 90-minute period is clear. He raped and murdered his victim and hid her body before Angel came back to him.

There is absolutely nothing in the record to indicate that Ray Moody is anything other

than a self-obsessed, psychopathic, liar. He is admitting to murder and rape. He is admitting to a motive to lie, namely, to cling to a little bargaining power over the plot of land that he owns. He is, using his own words, “vengeful.” When talking about Angel after she disobeyed him and entered a guilty plea, he said, “screw her,” and blamed her for his arrest and prison sentence. He even spoke about the thoughts he had of murdering Angel so that she would not tell on him.

He also details a preoccupation with his prison reputation, noting that the length of Angel’s sentence may have some bearing on his status among other inmates. It is surprising that anyone, let alone the government, would rely on someone like Ray Moody in crafting a sentencing recommendation.

Defense counsel welcomes the opportunity to cross-examine Ray Moody. His claims should be tested before this Court, under oath on the witness stand.

ANGEL VAUSE

Angel Vause began her struggle with drug addiction at age 12 after her parents divorced. Her addiction led her to pursue a GED rather than graduate high school. As a teenager, she completed two stints in rehab and spent time in a psychiatric ward after a suicide attempt. She married her first husband, an abusive alcoholic, at age 19 and had her first child at 20. During her 11-year marriage, she had three children. Though she wanted to work, her husband did not allow it.

Angel and her husband moved to Indiana with two of their children while the oldest stayed in Georgetown to live with his grandmother and attend high school. The entire time, Angel suffered physical abuse in secret. She finally found the courage to divorce her husband after he stopped beating her behind closed doors and started doing it in front of their children.

After the divorce, Angel supported herself and the children working as a cook in a bar in

a small town near the Indiana-Kentucky border. While working at the bar, she met her second husband, also an abusive alcoholic. It was not long after this second marriage began that Angel received news that her oldest son, 16, was killed in a car accident. She moved back to Georgetown with her children and her new husband to be with her mother.

After they arrived in South Carolina, her new husband's drinking worsened, and he was arrested after breaking Angel's nose and throwing her through a glass table. She left her second husband and he moved back to Indiana.

Two years later, in 2006, her father died of a heart attack. Angel suffered the trauma of witnessing the paramedics' unsuccessful attempt to resuscitate him. She began working for her mother's house cleaning service. After the deaths of her son and father, she had relapsed into serious drug use and was in an extremely vulnerable state. This is when Ray Moody came into her life.

Angel and Moody gradually started a relationship, though he was also involved with other men and women. Oftentimes they would drive to Myrtle Beach together to go to bars. Ray was always the driver because he did not drink, and Angel would drink and use drugs while they were out. It was on such a night that Ray pulled over and offered his victim a ride. Angel was intoxicated in the passenger seat and did not interact with the victim.

She only remembers looking into Ray's eyes and feeling fear when she realized what he was doing. Over the course of their relationship, Angel had come to know some of Ray's past, that he had been in prison, and that he had a reputation as a dangerous person. When he had been angry with her in the past, he had threatened to kill her.

Ray drove the victim down the Myrtle Beach strip and told her that he was kidnapping her and would release her after he received ransom money. At some point he stopped the truck,

got out, and handcuffed her. He drove to the Pole Yard south of Georgetown. Not long after they arrived at the Pole Yard, Angel left in the truck. She was terrified. Ray called her because he did not like that she was gone for so long. When she came back, the victim was gone.

Angel witnessed the abduction. She did not participate in luring the victim into the truck. She did not witness what Ray did to the victim. That all happened during the hour and a half that Angel was gone.

For years she lived with guilt and fear. Ray controlled her life. He cut her off from her friends and would not let her work. She depended on him completely. He weaseled his way into her family life. He did not have a family of his own.

He refers to “his” grandchildren in his interviews with the government. They are not his grandchildren. He does not care about them because he does not care about anyone but himself. He is using his make-believe status as their caretaker to cling to power over Angel and negotiate with the government so that he can still feel a sense of control. Ray has continued to write and call Angel’s brother, son, and mother to manipulate Angel.

Around 2015, Angel’s son found her with her wrists slashed and a stab wound in her leg. She had attempted suicide because she could not live with her involvement in Ray’s crimes. She was taken to the hospital and recovered. She continued under Ray’s control for years until the police finally connected Ray to his crime.

CONCLUSION

This case originally started with the government’s effort to hold Angel accountable for misleading them while they investigated Moody. The government sought to have her sentenced to two counts which each carried a maximum five-year sentence. They are now asking for twenty-four years because Angel failed to plead guilty to the original deal, a failure that came

about because Moody scared her into turning down the offer. They are supporting their effort with allegations that she did not admit to at the plea and which contradict their own investigation.

The defense respectfully requests that this Court reject the government's use of new allegations not included at the guilty plea. Furthermore, the defense respectfully requests that this Court sentence Angel to a guideline sentence as it is more than sufficient to punish her for providing false statements to the government. She is 57 and a criminal history category I. Ray Moody is behind bars for life, Angel should not receive the same fate.

Respectfully submitted,

s/Charles W. Cochran

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